

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** :

**v.** : **CRIMINAL NO. 14-598**

**THOMAS LINDENFELD** :

**UNOPPOSED MOTION FOR CONTINUANCE**

The government, by and through its attorneys, Zane David Memeger, United States Attorney, Paul L. Gray, Assistant United States Attorney, and Eric L. Gibson, Trial Attorney and Special Assistant United States Attorney, hereby submits this Unopposed Motion for Continuance of defendant's sentencing hearing, now scheduled for March 25, 2015.

On November 5, 2014, Defendant Thomas Lindenfeld was charged in an information with one count of conspiracy to commit wire fraud, in violation of 18 U.S.C. §§ 1343, 1346, and 1349. That same day, the defendant entered a guilty plea to the charge in the information. As part of the written plea agreement, the defendant has agreed to cooperate with an ongoing investigation and testify at any future proceedings related to that investigation. The investigation has not been concluded and Lindenfeld's cooperation is ongoing. As such, the government respectfully requests that the defendant's sentencing hearing be continued to a date in the future so that Lindenfeld may continue his cooperation.

The defendant, through counsel, has agreed to the requested continuance.

WHEREFORE, the government respectfully submits that the Motion for Continuance be granted.

Respectfully submitted,

ZANE DAVID MEMGER  
United States Attorney

/s/ Paul L. Gray  
PAUL L. GRAY  
Assistant United States Attorney

/s/ Eric L. Gibson  
ERIC L. GIBSON  
Trial Attorney &  
Special Assistant United States Attorney

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2015, after review of the government's Unopposed Motion for Continuance, the Court agrees that, for the reasons stated in said motion, the ends of justice are best served by granting this motion.

Therefore, IT IS ORDERED that the sentencing hearing currently scheduled for March 25, 2015, shall be continued until further notice of the Court.

BY THE COURT:

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**HONORABLE HARVEY BARTLE, III**  
*Judge, United States District Court*

Certificate of Service

I certify that on this day I caused a copy of the government's Unopposed Motion to Continue to be delivered by electronic mail and ECF upon:

Robert M. Weinberg  
Bredhoff and Kaiser, PLLC  
805 – 15<sup>th</sup> Street NW, Suite 1000  
Washington, DC 200015

s/ Eric L. Gibson  
ERIC L GIBSON  
Trial Attorney and Special Assistant United  
States Attorney

Date: February 27, 2015